

State of Colorado
Oil and Gas Conservation Commission

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Document Number:

402487955

Receive Date:

Site Investigation and Remediation Workplan (Supplemental Form)

This form shall be submitted to the Director for approval prior to the initiation of site investigation and remediation activities. However, this shall not preclude the Operator from taking immediate action to protect public health or safety, the environment, wildlife, or livestock.

This Form 27 describes site conditions as currently understood by the Operator; approval of this Form 27 by COGCC is based on the site conditions accurately described herein; any changes in site conditions identified during or subsequent to the performance of the approved workplan may necessitate additional investigation or remediation which shall be described on a supplemental Form 27.

This Form 27 is intended to provide basic information regarding the proposed site investigation and remediation actions, but the workplan may be more fully described in attached documentation.

Refer to Rules 340, 905, 906, 907, 908, 909, and 910

Report taken by:

OPERATOR INFORMATION

| | | |
|--|---|------------------------------|
| Name of Operator: <u>LARAMIE ENERGY LLC</u> | Operator No: <u>10433</u> | Phone Numbers |
| Address: <u>1401 SEVENTEENTH STREET #1401</u> | | Phone: <u>(970) 263-3641</u> |
| City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u> | | Mobile: <u>()</u> |
| Contact Person: <u>Joan Proulx</u> | Email: <u>jproux@laramie-energy.com</u> | |

PROJECT, PURPOSE & SITE INFORMATION

PROJECT INFORMATION
Remediation Project #: 14692 Initial Form 27 Document #: 402247335

PURPOSE INFORMATION

| | |
|--|--|
| <input type="checkbox"/> 901.e. Sensitive Area Determination | <input type="checkbox"/> 909.c.(5), Rule 910.b.(4): Remediation of impacted ground water |
| <input type="checkbox"/> 909.c.(1), Rule 905: Pit or PW vessel closure | <input type="checkbox"/> Rule 909.e.(2)A.: Notice completion of remediation in accordance with Rule 909.b. |
| <input type="checkbox"/> 909.c.(2), Rule 906: Spill/Release Remediation | <input checked="" type="checkbox"/> Rule 909.e.(2)B.: Closure of remediation project |
| <input type="checkbox"/> 909.c.(3), Rule 907.e.: Land treatment of oily waste | <input type="checkbox"/> Rule 906.c.: Director request |
| <input type="checkbox"/> 909.c.(4), Rule 908.g.: Centralized E&P Waste Management Facility closure | <input type="checkbox"/> Other _____ |

SITE INFORMATION N Multiple Facilities (in accordance with Rule 909.c.)

| | | | |
|--|----------------------------|-------------------------------|---|
| Facility Type: <u>SPILL OR RELEASE</u> | Facility ID: <u>469075</u> | API #: _____ | County Name: <u>MESA</u> |
| Facility Name: <u>HG 26-6</u> | Latitude: <u>39.334915</u> | Longitude: <u>-107.638951</u> | |
| ** correct Lat/Long if needed: Latitude: _____ | | Longitude: _____ | |
| QtrQtr: <u>SENW</u> | Sec: <u>26</u> | Twp: <u>8s</u> | Range: <u>92W</u> Meridian: <u>6</u> Sensitive Area? <u>Yes</u> |

SITE CONDITIONS

General soil type - USCS Classifications GC Most Sensitive Adjacent Land Use Ranching

Is domestic water well within 1/4 mile? No Is surface water within 1/4 mile? Yes

Is groundwater less than 20 feet below ground surface? No

Other Potential Receptors within 1/4 mile

Alkali Creek is approx 425 feet to the NW; an ephemeral drainage is approx 200 feet to the NE.

SITE INVESTIGATION PLAN

TYPE OF WASTE:

- | | | |
|--|--|--|
| <input checked="" type="checkbox"/> E&P Waste | <input type="checkbox"/> Other E&P Waste | <input type="checkbox"/> Non-E&P Waste |
| <input checked="" type="checkbox"/> Produced Water | <input type="checkbox"/> Workover Fluids | _____ |
| <input type="checkbox"/> Oil | <input type="checkbox"/> Tank Bottoms | |
| <input type="checkbox"/> Condensate | <input type="checkbox"/> Pigging Waste | |
| <input type="checkbox"/> Drilling Fluids | <input type="checkbox"/> Rig Wash | |
| <input type="checkbox"/> Drill Cuttings | <input type="checkbox"/> Spent Filters | |
| | <input type="checkbox"/> Pit Bottoms | |
| | <input type="checkbox"/> Other (as described by EPA) | _____ |

DESCRIPTION OF IMPACT

| Impacted? | Impacted Media | Extent of Impact | How Determined |
|-----------|----------------|------------------|---------------------------------|
| Yes | SOILS | 70 by 35 feet | Discovered during soil sampling |

INITIAL ACTION SUMMARY

Description of initial action or emergency response measures take to abate, investigate, and/or remediate impacts associated with E&P Waste.

During soil sample collection to confirm the soil beneath the secondary containment liner an area of potentially contaminated soil was discovered. Soil was discolored and had hydrocarbon odor. Staff began excavation immediately in an effort to delineate the horizontal and vertical extent of the contamination. Laramie is in the process of removing the tanks and the liner. We intend to continue with the excavation to determine the sub surface extent of contamination. Laramie believes it is attributable to a historical release.

PROPOSED SAMPLING PLAN

Proposed Soil Sampling

Will soil samples be collected as part of this investigation? (Number, type (grab/composite), analyses, and locations of samples):

Soil samples will be collected at various depths as material is removed during delineation of the contamination. They will be discrete samples intended to differentiate between impacted and non-impacted soils. Tanks and liner will likely be removed on November 25, 2019. Soil samples will be collected to delineate the contamination on that date.

Proposed Groundwater Sampling

Will groundwater samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Laramie does not anticipate encountering groundwater, the hydrological data indicates water level is 30 ft below surface.

Proposed Surface Water Sampling

Will surface water samples be collected as part of this investigation? (Number, analyses, and locations of samples):

Additional Investigative Actions

Additional alternative investigative actions described in attached Site Investigation Plan (summary):

SITE INVESTIGATION REPORT

SAMPLE SUMMARY

Soil

Number of soil samples collected 11

Number of soil samples exceeding 910-1 6

Was the areal and vertical extent of soil contamination delineated? Yes

Approximate areal extent (square feet) 2450

NA / ND

-- Highest concentration of TPH (mg/kg) 1.41

-- Highest concentration of SAR 14.4

BTEX > 910-1 No

Vertical Extent > 910-1 (in feet) 1

Groundwater

Number of groundwater samples collected 0

Was extent of groundwater contaminated delineated? No

Depth to groundwater (below ground surface, in feet)

Number of groundwater monitoring wells installed 0

Number of groundwater samples exceeding 910-1 0

 Highest concentration of Benzene (µg/l)

 Highest concentration of Toluene (µg/l)

 Highest concentration of Ethylbenzene (µg/l)

 Highest concentration of Xylene (µg/l)

 Highest concentration of Methane (mg/l)

Surface Water

0 Number of surface water samples collected

0 Number of surface water samples exceeding 910-1

If surface water is impacted, other agency notification may be required.

OTHER INVESTIGATION INFORMATION

Were impacts to adjacent property or offsite impacts identified?

Were background samples collected as part of this site investigation?

One background grab sample was collected on 11/7/2019.

Was investigation derived waste (IDW) generated as part of this investigation?

Volume of solid waste (cubic yards)

Volume of liquid waste (barrels)

Is further site investigation required?

Excavation to delineate the extent of contamination is ongoing. Tanks and liner will likely be removed on November 25, 2019. Soil samples will be collected on that date.

REMEDIAL ACTION PLAN

Does this Supplemental Form 27A include changes to a previously approved Remedial Action Plan? No _____

SOURCE REMOVAL SUMMARY

Describe how source is to be removed.

Excavated using heavy equipment.

REMEDICATION SUMMARY

Describe how remediation of existing impacts to soil and groundwater is to be accomplished (i.e. summarize remedial action plan). Provide a brief narrative description including: technical justification, schedule for implementation, estimated time to attain NFA status, plus plans and specifications for the selected remedial action technology.

The existing tanks were moved to a different location on the pad while sampling occurred and a temporary tank was brought in to accommodate the wells. After sampling, clean soil was brought in to replace the excavated materials. All impacted soil, the liner and the impacted gravel was removed by truck and disposed of at a licenced disposal site (Greenleaf). A new liner was brought to the pad and installed in the existing tank battery location. New gravel was brought in and compacted for the tank battery. The temporary tank was removed and 2 of the previous 7 tanks were installed in the existing tank battery location. The tank battery was not relocated to a new spot on the pad.

Soil Remediation Summary

In Situ

Ex Situ

_____ Bioremediation (or enhanced bioremediation)

Yes _____ Excavate and offsite disposal

_____ Chemical oxidation

_____ If Yes: Estimated Volume (Cubic Yards) _____ 100

_____ Air sparge / Soil vapor extraction

_____ Name of Licensed Disposal Facility or COGCC Facility ID # _____

_____ Natural Attenuation

No _____ Excavate and onsite remediation

_____ Other _____

_____ Land Treatment

_____ Bioremediation (or enhanced bioremediation)

_____ Chemical oxidation

_____ Other _____

Groundwater Remediation Summary

No _____ Bioremediation (or enhanced bioremediation)

No _____ Chemical oxidation

No _____ Air sparge / Soil vapor extraction

No _____ Natural Attenuation

No _____ Other _____

GROUNDWATER MONITORING

If groundwater has been impacted, describe proposed monitoring plan, including # of wells or sample points, monitoring schedule, analytical methods, points of compliance. Attach a groundwater monitoring location diagram.

Groundwater was not encountered during the sampling or remediation activities.

REMEDATION PROGRESS UPDATE

PERIODIC REPORTING

Frequency: Quarterly Semi-Annually Annually Other _____

Report Type: Groundwater Monitoring Land Treatment Progress Report O&M Report
 Other _____

WASTE DISPOSAL INFORMATION

Was E&P waste generated as part of this remediation? Yes _____

Describe beneficial use, if any, of E&P Waste derived from this remediation project:

There was no beneficial use of E&P waste derived from this remediation project.

Volume of E&P Waste (solid) in cubic yards _____ 100

E&P waste (solid) description Impacted soil _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: Greenleaf _____

Volume of E&P Waste (liquid) in barrels _____ 0

E&P waste (liquid) description _____

COGCC Disposal Facility ID #, if applicable: _____

Non-COGCC Disposal Facility: _____

REMEDATION COMPLETION REPORT

REMEDATION COMPLETION SUMMARY

Is this a Final Closure Request for this Remediation Project? Yes _____

Do all soils meet Table 910-1 standards? No _____

Does the previous reply indicate consideration of background concentrations? _____

Are the only residual soil impacts pH, SAR, or EC at depths greater than 3 feet below ground surface? Yes _____

Does Groundwater meet Table 910-1 standards? Yes _____

Is additional groundwater monitoring to be conducted? _____

RECLAMATION PLAN

RECLAMATION PLANNING

Describe reclamation plan. Discuss existing and new grade recontouring; method and testing of compaction alleviation; and reseeding program, including location of new seed, seed mix and noxious weed prevention. Attach diagram or drawing.

Reclamation will occur at final close out of facility.

Is the described reclamation complete? No _____

Does the reclamation described herein constitute interim or final reclamation of the Oil and Gas Location?

Interim? Final?

Did the Surface Owner approve the seed mix? No _____

If NO, does the seed mix comply with local soil conservation district recommendations? No _____

IMPLEMENTATION SCHEDULE

PRIOR DATES

Date of Surface Owner notification/consultation, if required. _____

Actual Spill or Release date, if known. _____

SITE INVESTIGATION DATES

Date of Initial Actions described in Site Investigation Plan (start date). 11/06/2019

Date of commencement of Site Investigation. 11/06/2019

Date of completion of Site Investigation. 11/30/2019

REMEDIAL ACTION DATES

Date of commencement of Remediation. _____

Date of completion of Remediation. _____

SITE RECLAMATION DATES

Date of commencement of Reclamation. _____

Date of completion of Reclamation. _____

OPERATOR COMMENT

The analytical data, maps and supporting documentation for this spill have been re-packaged into a binder (attached) which also includes additional background data from 2012.
 The analytical data indicates elevated readings for Arsenic; however, these readings are less than or comparable to the background Arsenic readings. Attached is a revised FAQ 31 and FAQ 32 letter to address Arsenic and SAR.

I hereby certify all statements made in this form are to the best of my knowledge true, correct, and complete.

Signed: Joan Proulx

Title: Regulatory Analyst

Submit Date: _____

Email: jproulx@laramie-energy.com

Based on the information provided herein, this Application for Site Investigation and Remediation Workplan complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: _____

Date: _____

Remediation Project Number: 14692

COA Type

Description

| | |
|--|--|
| | |
|--|--|

Attachment Check List

Upon approval, the approved Form 27 and all listed attachments will be indexed to the Remediation Project file. Only the approved Form 27 will also be indexed to the related Facilities.

Att Doc Num

Name

| | |
|------------------|---------------------------|
| <u>402487979</u> | <u>ANALYTICAL RESULTS</u> |
| <u>402488012</u> | <u>OTHER</u> |

Total Attach: 2 Files

General Comments

User Group

Comment

Comment Date

| | | |
|--|--|---------------------|
| | | Stamp Upon Approval |
|--|--|---------------------|

Total: 0 comment(s)